

# Exhibit C

# Exhibit CC

PIETRANTONI MENDEZ & ALVAREZ LLC

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August 21, 2019

Mr. Ian D. Berg, Esq.  
Abraham, Frucheter & Twersky, LLP  
11622 El Camino Real, Suite 100  
San Diego, CA 92130

Re: *In re Volkswagen "Clean Diesel" Mktg., Sales Practices, and Prods. Liab. Litig.*,  
MDL No. 2672 CRB & BRS v. Volkswagen AG et al., N.D. Cal. No. 16cv-3435  
("Bondholders Securities Action") – Volkswagen's Request for Documents

Dear Mr. Berg:

This is to inform you that Pietrantonio, Mendez & Alvarez LLC will be representing Mr. Jesus D. Mattei ("Mr. Mattei"), an ex-employee of Santander Asset Management LLC ("SAM") in connection with the Rule 45 subpoenas that he was served with in the above referenced civil action.

Mr. Mattei was asked to provide his responses to the subpoena and produce certain documents by August 21, 2019. However, Mr. Mattei **does not possess nor maintain** any of the documents requested pursuant to Schedule A of the subpoena. Insofar as Mr. Mattei's deposition is concerned, the trade ticket produced to Lead Plaintiff Puerto Rico Government Employees and Judiciary Retirement Systems Administration and Defendants Volkswagen AG, Volkswagen Group of America, Inc., Volkswagen Group of America Finance LLC, Martin Winterkorn and Michael Horn, and identified with bates stamp SAM\_VW-000977, shows that Mr. Mattei did not partake in the purchase of the bonds at issue therein. For ease of reference, attached as **ADDENDUM 1** please find a copy of the trade ticket. Due to Mr. Mattei's lack of participation in the purchase of said bonds, we do not foresee how Mr. Mattei's testimony could shed light to the controversy at hand. Moreover, I must inform you that I am unavailable to attend the taking of Mr. Mattei's deposition on September 12, 2019 as I will be at a hearing on another case.

In light of the above, I would appreciate if we could set a date and time to discuss this matter and agree on how to best move forward.

Best,



Néstor M. Méndez Gómez

cc: William Wagener  
Joseph González  
David H. Dickieson  
Christopher J. Stanley

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# ADDENDUM 1

Santander Asset Management  
 Trade Ticket

Trade Date Account	5/15/2014 Cusip	Settle Date Issuer	5/23/2014 Coupon	Maturity	Trade Price	Face Value	Accrued Interest	Principal	P&I	Counterparty
RETIRO Buys	928668AA0	VolksWagen	1.250	5/23/2017	100.05000000%	1,870,000.00	0.00	1,870,935.00	1,870,935.00	JP MORGAN
RETIRO Buys	928668AA0	VolksWagen	1.250	5/23/2017	99.93800000%	2,340,000.00	0.00	2,338,549.20	2,338,549.20	BAMLY

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